

<p style="text-align: right;">Page 102</p> <p>1 E. SLININ</p> <p>2 filed any tax returns with any other</p> <p>3 governmental entity?</p> <p>4 A. I don't know.</p> <p>5 Q. Do you know who is</p> <p>6 responsible for filing the federal</p> <p>7 returns for what you call the Eduard</p> <p>8 Slinin/Alex Shnaider partnership?</p> <p>9 A. The accountants, which</p> <p>10 everybody has its own accountant.</p> <p>11 Alex Shnaider has his own accountant,</p> <p>12 and I have my own accountant.</p> <p>13 Q. Your accountant is who?</p> <p>14 A. Richard Levine.</p> <p>15 Q. Is that an outside firm?</p> <p>16 A. Yes.</p> <p>17 Q. Okay.</p> <p>18 Is he with a firm?</p> <p>19 A. He is with a firm.</p> <p>20 Q. Do you remember the name of</p> <p>21 the firm?</p> <p>22 A. Dennis Kalick & Associates.</p> <p>23 Q. Do you know if Mr. Levine</p> <p>24 ever filed anything with any</p> <p>25 governmental entity on your behalf</p>	<p style="text-align: right;">Page 104</p> <p>1 E. SLININ</p> <p>2 Q. Do you know if you ever</p> <p>3 reported on any state tax return that</p> <p>4 Mr. Shnaider owed money to?</p> <p>5 A. I don't know. My accountant</p> <p>6 has all that.</p> <p>7 Q. Do you know if you ever</p> <p>8 reported on any tax submission to any</p> <p>9 other governmental authority that Mr.</p> <p>10 Shnaider owed money to you?</p> <p>11 A. I don't know. My accountant</p> <p>12 has that.</p> <p>13 Q. Okay.</p> <p>14 Do you know if you ever</p> <p>15 receive a K1, a form K1, for the</p> <p>16 Eduard Slinin/Alex Shnaider</p> <p>17 partnership?</p> <p>18 A. I had asked Alex Shnaider</p> <p>19 for it. He said he will take care of,</p> <p>20 and I never got anything from him.</p> <p>21 Q. When did you ask him for</p> <p>22 this?</p> <p>23 A. Back in 2011.</p> <p>24 Q. Did you ask at any time</p> <p>25 prior that?</p>
<p style="text-align: right;">Page 103</p> <p>1 E. SLININ</p> <p>2 regarding the Eduard Slinin/Alex</p> <p>3 Shnaider partnership that you allege?</p> <p>4 A. No.</p> <p>5 Q. Do you know if Mr. Levine</p> <p>6 has any records regarding the Eduard</p> <p>7 Slinin/Alex Shnaider partnership?</p> <p>8 A. I don't know.</p> <p>9 Q. Did you ever ask Mr. Levine</p> <p>10 to prepare -- well, strike that.</p> <p>11 Did you ever ask Mr. Levine</p> <p>12 to perform any work with regard to the</p> <p>13 Eduard Slinin/Alex Shnaider</p> <p>14 partnership that you asserted?</p> <p>15 A. It is not a partnership.</p> <p>16 It's the money that is owed by Mr.</p> <p>17 Shnaider to me, he is aware of it. My</p> <p>18 accountant is aware of it, and they</p> <p>19 know everything.</p> <p>20 Q. Did you -- strike that.</p> <p>21 Do you know if you ever</p> <p>22 reported on any federal tax returns</p> <p>23 that Mr. Shnaider owed money to you?</p> <p>24 A. I don't know. I have to ask</p> <p>25 my accountant.</p>	<p style="text-align: right;">Page 105</p> <p>1 E. SLININ</p> <p>2 A. 2010, I don't remember</p> <p>3 exactly -- I know we had multiple</p> <p>4 conversations on the phone over that,</p> <p>5 and he said that he will take care of</p> <p>6 it, and then --</p> <p>7 Q. What exactly did you ask</p> <p>8 for?</p> <p>9 A. Where is the K1, the</p> <p>10 partnership, and he said, "I will take</p> <p>11 care of it," and that was it. It was</p> <p>12 verbally over the phone. He said, "I</p> <p>13 will send it out," and that was it.</p> <p>14 Q. Send what out?</p> <p>15 A. The K1s.</p> <p>16 Q. When do you allege this</p> <p>17 partnership began?</p> <p>18 A. Well, we met in New York,</p> <p>19 and we were partners, we were friends.</p> <p>20 That's when the whole thing -- when we</p> <p>21 started dealing with the airplanes.</p> <p>22 Q. What year was that, 2007?</p> <p>23 A. 2007.</p> <p>24 Q. Prior to 2010, did you ever</p> <p>25 receive any K1s?</p>

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where it says, "Mr. Eduard Slinin as referenced in connection to the CL850 Aircraft Investments Ltd company has no ownership stake;" do you see that?

A. I don't remember what he wrote.

Q. I am asking if you see it?

A. I see it, but I don't have any recollection on it.

Q. You don't have a recollection of receiving this?

A. No.

Q. Do you see where there is a signature there, it's faint, but do you see that?

A. Yes, it's the -- Mr. Balakirev signed.

Q. Okay.
And who is that gentleman, sir?

A. He is the attorney for Mr. Pirumov. Whatever Alex Shnaider told me to do, I followed his instructions.

Q. I am not asking you that,

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sir. There is not a pending question. If you look at the signature on the second page, it is your testimony that is Mr. Balakirev, and not Mr. Rependa? Isn't Mr. Balakirev copied here?

A. Maybe it came from what's his name -- George Rependa. Yeah, it could have came from his because it says, "Executive Aircraft Services."

Q. That was Mr. Rependa's companies?

A. Yes, Executive Aircraft Services is Mr. Rependa's company.

Q. If you look at the first page of this document, it's an e-mail from Mr. Rependa to you and other individuals dated September 14, 2008.

Do you see that?

A. It says -- um --

Q. I'm just asking if you see

--
A. No. I mean, it's an e-mail here, but I don't remember. I don't recall.

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Q. Okay, but it references attaching the letter that we were just talking about as the second page.

A. Yes.

Q. Do you know why Mr. Rependa wrote this letter?

A. Because Mr. Shnaider told him to do that.

Q. Do you know for sure that Mr. Shnaider told him to do that?

A. Nothing Mr. Rependa would do without Mr. Shnaider's direction.

Q. You have no recollection of Mr. Shnaider instructing Mr. Rependa to do this?

A. I just know how the system works with Mr. Shnaider, with Mr. Rependa, with Mr. Rob Lee, Alex Shnaider used to commend everything.

Q. At the time of this e-mail, which you received on September 14, 2008, did you believe that you had an ownership position in the CL850 Aircraft Investments Limited company?

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A. I do believe everything that I did with Alex Shnaider that pertains to the aircraft I was his 50/50 partner. That's how always we worked.

Q. Did you ever tell anyone that you thought you had an ownership interest in the CL850 Aircraft Investments Limited, and that you believed this statement was incorrect?

A. I don't recall. I don't remember.

Q. I am going to ask you to take a look at what we will mark as Slinin 10.

(Whereupon, e-mails were marked as Slinin Exhibit 10, for identification, as of this date.)

Q. I am going to ask you to take a look at the document, and just tell me if you have seen this before.

A. It's an e-mail -- I mean, I never remember seeing it. I don't remember.

Q. If you look at the very

<p style="text-align: right;">Page 122</p> <p>1 E. SLININ</p> <p>2 Milo's?</p> <p>3 A. Even before the meeting. We</p> <p>4 always -- we were family friends, we</p> <p>5 went out with our wives. We had even</p> <p>6 New Year's Eve celebration with his</p> <p>7 family, my family was there. He came</p> <p>8 to my daughter's Bat Mitzvah with his</p> <p>9 wife.</p> <p>10 Q. Did you ever visit Mr.</p> <p>11 Shnaider in Toronto?</p> <p>12 A. Yes, I did.</p> <p>13 Q. Did you ever visit him</p> <p>14 elsewhere?</p> <p>15 A. In Monte Carlo on his boat,</p> <p>16 during the Grand Prix he invited us,</p> <p>17 me and my wife.</p> <p>18 Q. Anyplace else?</p> <p>19 A. Montreal he invited me.</p> <p>20 Q. Anyplace else that you could</p> <p>21 think of?</p> <p>22 A. He was always inviting me to</p> <p>23 go with him to Moscow with his plane.</p> <p>24 Q. Prior to this meeting at</p> <p>25 Milo's, you indicated there might have</p>	<p style="text-align: right;">Page 124</p> <p>1 E. SLININ</p> <p>2 I have exceptional contacts with</p> <p>3 Bombardier, and we will be able to</p> <p>4 make some profit. So, see if you can</p> <p>5 get some buyers, and we together would</p> <p>6 sell it and profit on it." I said,</p> <p>7 "That sounds like an interesting</p> <p>8 proposition, and I will reach out to</p> <p>9 some of my friends, and to my</p> <p>10 business, and I will see of anybody</p> <p>11 expressing an interest of buying an</p> <p>12 aircraft." I was in South of France</p> <p>13 in Monte Carlo, and all of a sudden I</p> <p>14 received a phone call and they said,</p> <p>15 "We are expressing an interest to buy</p> <p>16 some aircraft. Can you tell us what</p> <p>17 about?" I basically was coached by</p> <p>18 Alex Shnaider what to say, and what to</p> <p>19 do, and I basically said, "That's the</p> <p>20 deal. This is what I am able to do, I</p> <p>21 am able to save you money when are you</p> <p>22 going to buy through us versus when</p> <p>23 you are going to buy from a Russian</p> <p>24 dealer who sells Bombardier aircrafts</p> <p>25 in Moscow," and there was a</p>
<p style="text-align: right;">Page 123</p> <p>1 E. SLININ</p> <p>2 been a meeting the day before;</p> <p>3 correct?</p> <p>4 A. Correct.</p> <p>5 Q. Where was that meeting; if</p> <p>6 you recall?</p> <p>7 A. Central Park South in a</p> <p>8 hotel.</p> <p>9 Q. Do you recall the name of</p> <p>10 the hotel?</p> <p>11 A. No.</p> <p>12 Q. Prior to that meeting or</p> <p>13 meetings at Milo's, and a hotel near</p> <p>14 Central Park South, had you ever</p> <p>15 discussed with Mr. Shnaider possibly</p> <p>16 buying airplanes with him?</p> <p>17 A. Yes, I did.</p> <p>18 Q. Okay.</p> <p>19 When was the first time that</p> <p>20 you recall?</p> <p>21 A. We started basically to talk</p> <p>22 in 20 -- late 2005, probably 2006, but</p> <p>23 on and off, on and off. Then, he told</p> <p>24 me how he does business, and then he</p> <p>25 told me, "Look, if you get the buyers,</p>	<p style="text-align: right;">Page 125</p> <p>1 E. SLININ</p> <p>2 significant difference. There was</p> <p>3 about five to 6,000,000 difference</p> <p>4 between North American prices and</p> <p>5 Russian prices. At that time, he</p> <p>6 said, "I am interested." I said,</p> <p>7 "Well, the next step, I will put you</p> <p>8 together with my partner associate."</p> <p>9 So, basically Alex said, "I don't want</p> <p>10 to talk to anybody. You are with</p> <p>11 them. I will give you Marechal who is</p> <p>12 the attorney in Switzerland, and I</p> <p>13 will direct him what to do," and that</p> <p>14 was it.</p> <p>15 Q. Okay.</p> <p>16 So, this call that you had</p> <p>17 with a prospective buyer from Monte</p> <p>18 Carlo, was Mr. Shnaider there at the</p> <p>19 same time in Monte Carlo?</p> <p>20 A. I don't remember.</p> <p>21 Q. The discussion that you just</p> <p>22 related, was that a discussion you had</p> <p>23 with him in Monte Carlo?</p> <p>24 A. With who; with Alex?</p> <p>25 Q. With Mr. Shnaider, yes.</p>

<p style="text-align: right;">Page 126</p> <p>1 E. SLININ</p> <p>2 A. Mr. Shnaider, I don't</p> <p>3 remember. I was in Monte Carlo, I</p> <p>4 don't remember where Mr. Shnaider was.</p> <p>5 I had spoken to a potential buyer, and</p> <p>6 then turned to be the next call was</p> <p>7 Mr. Pirumov. He said, "I am</p> <p>8 expressing an interest in buying those</p> <p>9 planes," and that's when I met with</p> <p>10 Mr. Pirumov. I think I met with him</p> <p>11 in Moscow, and I immediately reached</p> <p>12 out to Alex, and there was a lot of</p> <p>13 occasions that Alex was in Moscow, and</p> <p>14 we met at the Hyatt Regency Hotel</p> <p>15 where he has always stayed.</p> <p>16 Q. Those talks you said began</p> <p>17 in 2005 and 2006; correct?</p> <p>18 A. The talks were in 2005,</p> <p>19 2006, but the concrete deal was made</p> <p>20 in New York when we already knew we</p> <p>21 had a buyer. Now, Alex said, "Let me</p> <p>22 see, we need to negotiate the deal</p> <p>23 with Bombardier, with Jahid." So,</p> <p>24 Jahid came to New York, specifically,</p> <p>25 because I was in New York and Alex was</p>	<p style="text-align: right;">Page 128</p> <p>1 E. SLININ</p> <p>2 breakfast together, me and him.</p> <p>3 Q. Did you put anything in</p> <p>4 writing?</p> <p>5 A. No.</p> <p>6 MS. DYER: Let's go ahead</p> <p>7 and take a break. We have lunch.</p> <p>8 THE VIDEOGRAPHER: The time</p> <p>9 is now 1:43 p.m. We are now off</p> <p>10 the record.</p> <p>11 (Whereupon, a discussion</p> <p>12 was held off the record.)</p> <p>13 THE VIDEOGRAPHER: The time</p> <p>14 is now 2:24 p.m. We are now back</p> <p>15 on the record.</p> <p>16 Q. Mr. Slinin, you testified</p> <p>17 prior to the break that you believed</p> <p>18 that you had some type of ownership</p> <p>19 interest in CAC; do you recall that?</p> <p>20 A. Yes.</p> <p>21 Q. You testified prior to the</p> <p>22 break that you believe you had some</p> <p>23 ownership in CL850; correct?</p> <p>24 A. Correct.</p> <p>25 Q. Is it your testimony that</p>
<p style="text-align: right;">Page 127</p> <p>1 E. SLININ</p> <p>2 in New York. That is when we made the</p> <p>3 deal with Jahid, how much we were</p> <p>4 going to be buying the plane for.</p> <p>5 Q. But you had already agreed</p> <p>6 with Mr. Shnaider prior to that if you</p> <p>7 could bring buyers to the table that</p> <p>8 you would split the profits; correct?</p> <p>9 A. Yes, 50/50.</p> <p>10 Q. Do you recall approximately</p> <p>11 when you had reached that agreement?</p> <p>12 A. We reached that agreement in</p> <p>13 2006 I think.</p> <p>14 Q. Do you recall where you</p> <p>15 reached that agreement; was it by</p> <p>16 telephone, e-mail, in person?</p> <p>17 A. It was in person, and it was</p> <p>18 in New York.</p> <p>19 Q. Where in New York?</p> <p>20 A. Somewhere in one of the</p> <p>21 hotels that he stayed. He used to</p> <p>22 stay either Four Seasons or on Central</p> <p>23 Park one of the properties, or the</p> <p>24 Peninsula on 55th and 5th. One of the</p> <p>25 New York City hotels. We had</p>	<p style="text-align: right;">Page 129</p> <p>1 E. SLININ</p> <p>2 you had a partnership, that was in</p> <p>3 addition to your interest in CAC and</p> <p>4 CL850?</p> <p>5 A. I am trying to be -- can you</p> <p>6 interpret it a little bit better?</p> <p>7 Partnership and ownership, what do you</p> <p>8 mean, specifically?</p> <p>9 Q. Well, that's what we are</p> <p>10 here for. That is the \$60,000 pyramid</p> <p>11 question here.</p> <p>12 Is it your testimony that</p> <p>13 separate and apart from any interest</p> <p>14 you had in either CAC or CL850, you</p> <p>15 had a partnership that was formed with</p> <p>16 Mr. Shnaider?</p> <p>17 A. Everything was done with Mr.</p> <p>18 Shnaider, as I told you before, with a</p> <p>19 verbal agreement, we have a full</p> <p>20 understanding. Furthermore, Mr.</p> <p>21 Shnaider clearly was aware of it that</p> <p>22 we are partners, 50/50, but now as far</p> <p>23 as the book and records as I described</p> <p>24 to you before, I never did anything</p> <p>25 except talking to him on the phone.</p>